### BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

# RESPONSES OF UNITED STATES POSTAL SERVICE WITNES O'HARA TO INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T30-7 AND T30-8)

The United States Postal Service hereby files the responses of witness O'Hara to the following interrogatories of United Parcel Service, dated August 18, 1997: UPS/USPS-T30-7 and T30-8.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202)268-2998/FAX: -5402 August 25, 1997

# RESPONSE OF U.S. POSTAL SERVICE WITNESS O'HARA TO INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T30-7.** Please confirm that an FY 1998 after-rates ratio of revenue to incremental cost for Parcel Post below 1 would be unacceptable to the Postal Service. If not confirmed, please explain.

### **RESPONSE:**

Confirmed, for all subclasses during the test year.

# RESPONSE OF U.S. POSTAL SERVICE WITNESS O'HARA TO INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T30-8.** Please confirm that a subclass of mail with a ratio of revenue to incremental cost below 1 in a given year would be cross-subsidized by the other subclasses of mail. If not confirmed, please explain.

### **RESPONSE:**

Please see my response to UPS/USPS-T30-7.

### **DECLARATION**

I, Donald J. O'Hara, hereby declare, under penalty of perjury, that the foregoing Docket No. R97-1 interrogatory responses are true to the best of my knowledge, information, and belief.

8-25-97

Date

### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 August 25, 1997